



Application for Works Approval

Part V Division 3 of the *Environmental Protection Act 1986*

Works Approval Number W6610/2021/1

Applicant Nationwide Oil Pty Ltd

ACN 066 383 364

File number DER2018/001042-6-13

Premises Nationwide Oil Pty Ltd
28 Kenwick Road
MADDINGTON WA 6109

Legal description

Lot 801 ON Deposited Plan 41305

Certificate of Title Volume 2978 Folio 451

As defined by the premises maps attached to the issued works approval

Date of report 6 May 2022

Decision Works approval granted

SENIOR INDUSTRY REGULATION OFFICER REGULATORY SERVICES

an officer delegated under section 20 of the *Environmental Protection Act 1986* (WA)

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1. Decision summary

This decision report documents the assessment of potential risks to the environment and public health from emissions and discharges during the construction and operation of the premises. As a result of this assessment, works approval W6610/2021/1 has been granted.

2. Scope of assessment

2.1 Regulatory framework

In completing the assessment documented in this decision report, the Department of Water and Environmental Regulation (the department; DWER) has considered and given due regard to its regulatory framework and relevant policy documents which are available at <https://dwer.wa.gov.au/regulatory-documents>.

2.2 Application summary and overview of premises

On 20 August 2021, the applicant submitted an application for a works approval to the department under section 54 of the *Environmental Protection Act 1986* (EP Act).

The application is to undertake construction works relating to the acceptance, storage of bulk and packaged liquid wastes at the Premises. The Premises is located at 3 Clifford Street Maddington WA 6109.

The Premises relates to the categories and assessed design capacities under Schedule 1 of the *Environmental Protection Regulations 1987* (EP Regulations) which are defined in Works Approval W6531/2021/1.

The infrastructure and equipment relating to the premises category and any associated activities which the department has considered in line with *Guidance Statement: Risk Assessments* (DER 2017) are outlined in Works Approval W6610/2021/1.

2.3 Proposed works

As part of its network, Cleanaway operates waste hydrocarbon facilities at 32 Ewing Street in Bentley and 113 Ewing Street in Welshpool under its Nationwide Oil subsidiary. Both of the existing Ewing Street facilities are regulated as prescribed premises by the Department of Water and Environmental Regulation (DWER) under Part V Division 3 of the *Environmental Protection Act 1986* (EP Act).

Nationwide Oil holds Licence L8740/2013/2 for the 32 Ewing Street facility and Licence L8272/2008/2 for the 113 Ewing Street facility. In May 2021, the majority of operations at 113 Ewing Street were relocated to 32 Ewing Street.

Cleanaway has identified the need for a purpose-built facility in Perth to facilitate growth and introduce increased efficiencies to the consolidated hydrocarbons operations. Cleanaway has identified a site for the new facility at 33 Clifford Street in Maddington, City of Gosnells (the premises) and is proceeding to obtain environmental approvals for its development.

This document supports Cleanaway's application for a works approval to construct a new waste hydrocarbon facility at the premises. The application is for the following categories of prescribed premises listed in Part 1 of Schedule 1 of the *Environmental Protection Regulations 1987*.

The premises will accept waste from the broader Perth Metropolitan Area following the construction and development of the facility. The premises will incorporate the following infrastructure as shown in Figure 1:

- Offices/amenities
- Workshop
- Bunded Warehouse
- Bunded Tank Farm
- Hardstand

The premises will operate between the following hours:

- Office – 7AM to 5PM, Monday to Friday;
- Workshop and Bunded Warehouse – 6AM to 4PM, Monday to Friday; and
- Tank Farm – 24 hours a day (typically 2AM to 8PM), Monday to Sunday.

3. Planning Approval

On 21 December 2021, Council approved the Development Application (DA21/00486) planning approval for an Industry – Noxious (Waste Hydrocarbon Processing and Transfer Facility) at 33 (Lot 801) Clifford Street, Maddington.

In its application the City considered drainage, noise and odour in its assessment and unlikely to negatively impact on nearby sensitive receptors.

The proposed development is industrial in nature and is consistent with the City of Gosnells planning and development strategy. Matters pertaining to traffic management and drainage will be dealt via planning conditions.

4. Waste acceptance and infrastructure

4.1 Waste acceptance

Waste delivery will be received by Liquid wastes will be received either as bulk delivery or via packaged containers as defined in the *Environmental Protection (Controlled Waste) Regulations 2004*. This will include both bulk and packaged controlled waste. The premises will receive oil filters, 20 litre, 200 litre and 1,000 litre intermediate bulk containers of oily waste.

Waste will be unloaded and stored in the Bunded Tank Farm or Bunded Warehouse as shown on the Site Plan in Attachment A. Waste liquid hydrocarbons will be transferred into bulk storage tanks at the Bunded Tank Farm. No wastewater treatment will be undertaken onsite, only storage.

Sludge waste accumulated at the base of the wastewater and oil storage tanks will be transferred off-site or to the fixation pit for mixing with other wastes into a suitable composition for disposal to off-site landfill.

Oil filters will be crushed with oil transferred to a sealed container and the crushed filters aggregated and stored in the Bunded Warehouse for transfer off-site for recovery. Other oil contaminated solid wastes will be stored in bins in the Bunded Warehouse.

The following waste types is proposed to be accepted on the premises:

Waste acceptance, processing, and infrastructure requirements						
Waste type	Waste Code	Quantity Limit	Specification	Process	Process requirements	Infrastructure requirements
Waste mineral oils unfit for their intended purpose	J100	Combined premises total of 25,000 tonnes per year of all liquid wastes accepted. Combined premises total of 550 tonnes per year for all solid wastes accepted.	Packaged and bulk wastes	Receipt, handling, physical or chemical treatment, and temporary storage prior to off-site recovery or disposal	Waste will be stored and processed in a manner that prevents incompatible wastes mixing	Stored in impervious containers or tanks within bunded hardstand areas
Waste oil and water mixtures or emulsions, and hydrocarbon and water mixtures or emulsions	J120					
Oil interceptor wastes	J130					
Waste tarry residues arising from refining, distillation or pyrolytic treatment	J160					
Used oil filters	J170					

4.2 Workshop

The enclosed Workshop will be used to service Cleanaway's parts washer business. Parts washers will be serviced and maintained in the building. The Workshop will include a spray paint booth that will be used to paint and refurbish parts washers.

The location of the spray paint booth is shown on Figure 1. The booth will be designed, constructed, installed, and maintained in accordance with AS/NZS 4114.1-2013 Spray painting booths and the *Environmental Protection (Metal Coating) Regulations 2001*.

The booth will exhaust to atmosphere from the exhaust stack 3 m above the roof height.

A Dangerous Goods (DG) container will be located outside the Bunded Warehouse to store paints, thinners and solvents (<2,000 L). The DG container will be subject to a DG licence from Department of Mines, Industry Regulation and Safety (DMIRS). Any flammable or combustible material will need to be stored in accordance with the DMIRS Guide Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007.

4.3 Bunded warehouse

The 1,600 m² Bunded Warehouse area will be used for waste storage activities, including an oil filter press area, waste bins and a fixation pit that will be used to stabilise oily sludges into a composition suitable for off-site disposal in landfill. The area will also include a wastewater tank used to store separated water from the tank farm and a washdown bay for washing parts washers, equipment, and vehicles.

The discharge from the washdown bay will be serviced by an oily water interceptor with water pumped to the water tank. Oil and oily sludge separated by the interceptor will be managed through the premises. The stored wastewater where possible will be reused on-site for washdown purposes or removed off-site for treatment.

The site is not currently serviced by a reticulated sewer for trade waste purposes. The nearest Water Corporation sewer connection point is approximately 175 m from the site. Cleanaway is pursuing a trade waste connection to the Water Corporation sewer to allow disposal of wastewater from the site later if it is feasible. Initial advice from Water Corporation states that there is no short term or long term plans for sewer in the area. In the interim Cleanaway will remove and transport wastewater offsite to one of its licensed wastewater treatment plants for discharge.

4.4 Bunded tank farm

The Bunded Tank Farm includes four 300 kL oil storage tanks and two 65 kL separated water tanks. The Bunded Tank Farm will be covered and will have a bunded concrete floor (41 m x 33 m). The oil and water tanks will be contained in a concrete sump (41 m x 15 m x 0.9 m or 541 m³). The Bunded Tank Farm area also includes covered tanker and Intermediate Bulk Container (IBC) unloading and loading areas, and an external tanker refueling area with self-bunded kerosene and diesel tanks and bowsers. The loading, unloading, and refueling area will be graded to drain towards the tank sump to ensure any spillages or leaks are captured. Figure 3 shows the proposed tanks configuration and locations.

All storage tanks will be fitted with level indication and high-level warning alarms.

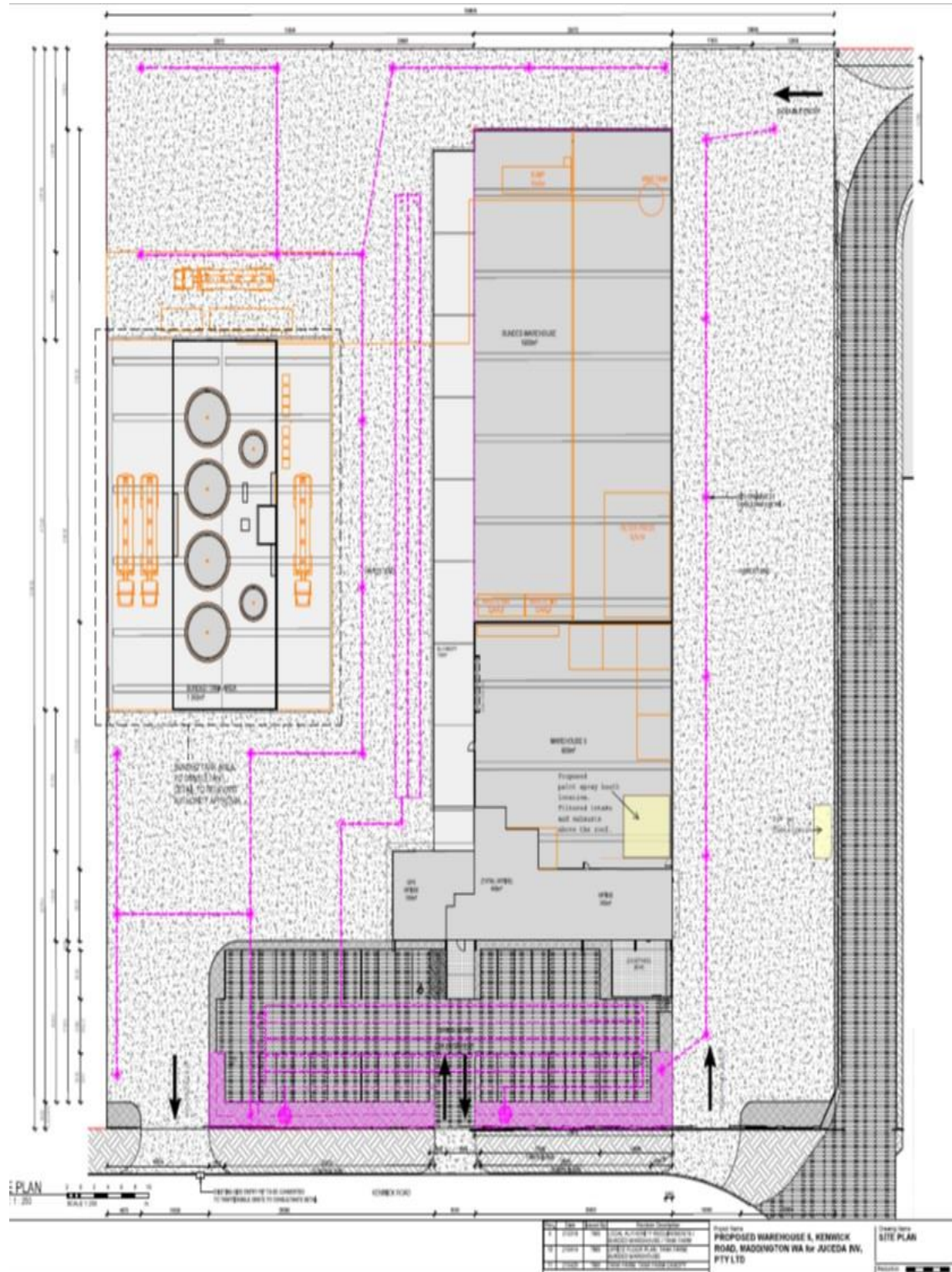
Design and installation of oil and wastewater storage tanks will be of 6mm structural steel. All approved drawing designs including tanks, containment areas and associated pipe work will be certified by a qualified engineer as being, checked, tested, and fit for purpose in accordance with the relevant standards and design requirements.

4.5 Stormwater

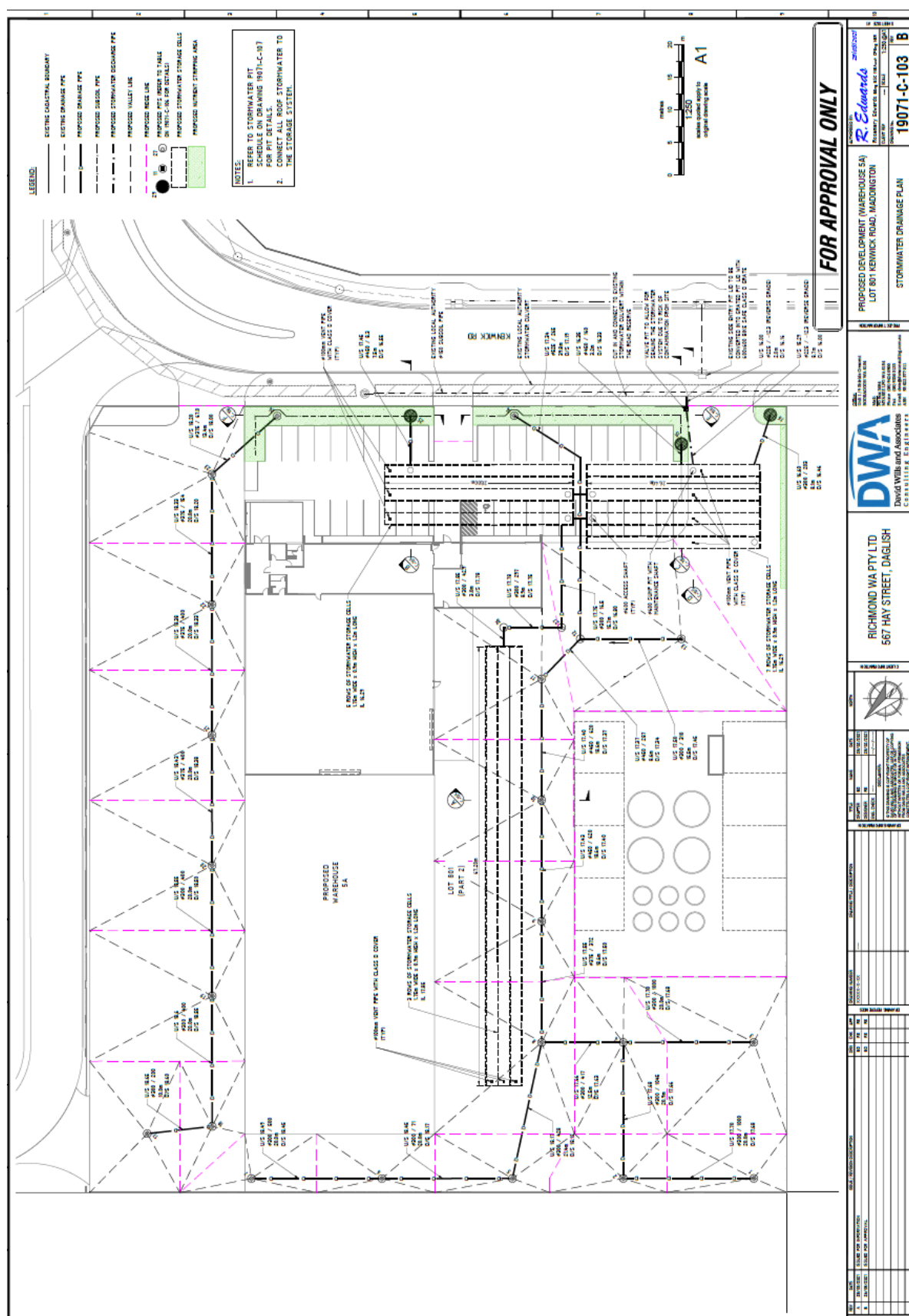
Rainwater from the roofs of the Workshop, Bunded Warehouse and Bunded Tank Farm and from the external hardstand yards will be managed by a stormwater system as shown on the Figure 2. Rainwater storage for the premises has been sized to comply with the City of Gosnells requirements.

The relevant Local Water Management Strategy for the premises requires the provision of 306 m³ of stormwater storage per hectare of catchment for a 1% Annual Exceedance Probability (AEP) rainfall event. Therefore, a storage capacity of 394.2 m³ is required for the premises catchment of 12,884 m².

Figure 1: Proposed site plan and infrastructure



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5. Risk assessment

The department assesses the risks of emissions from prescribed premises and identifies the potential source, pathway and impact to receptors in accordance with the *Guideline: Risk Assessments* (DWER 2020).

To establish a risk event there must be an emission, a receptor which may be exposed to that emission through an identified actual or likely pathway, and a potential adverse effect to the receptor from exposure to that emission.

5.1 Source-pathways and receptors

5.1.1 Emissions and controls

The key emissions and associated actual or likely pathway during premises operation which have been considered in this decision report are detailed in Table 1 below. Table 1 also details the control measures the applicant has proposed to assist in controlling these emissions, where necessary.

Table 1: Proposed applicant controls

Emission	Sources	Potential pathways	Proposed controls
Construction			
Dust	Construction works (internal and external infrastructure)	Air/windborne pathway	<ul style="list-style-type: none">Wetting down of dust generating activities during construction phase of site.General construction activities to be in accordance with <i>A guideline for managing the impacts of dust and associated contaminants from land development sites, contaminated sites remediation and other related activities</i> (DEC 2011).
Noise	Construction works (internal and external infrastructure)	Air/windborne pathway	<ul style="list-style-type: none">Construction works will be carried out between 7am and 7pm, Monday to Saturday (excluding Sundays and public holidays)Construction to be in accordance with <i>Environmental Protection (Noise) Regulations 1997</i>.
Operation			
Noise	Acceptance, treatment and storage of waste (liquid and sludge) Vehicle movements	Air/windborne pathway causing impacts to health and amenity	<ul style="list-style-type: none">The normal operating hours are as follows: 1. Office - 7am- 5pm Monday to Friday 2. Workshop/Warehouse: 6AM to 4PM, Monday to Friday.

Emission	Sources	Potential pathways	Proposed controls
			<p>3. Tank Farm: 24 hours operations typically truck will leave site at 2am returning by 8am.</p> <ul style="list-style-type: none"> Noise generating potential will be low as minimal processing will be undertaken onsite. Majority of work being undertaken is transfer of liquid waste to storage tanks. Noise will be limited to truck entering and leaving the site. Activity is located within area zoned for commercial and industrial activities. Nearest sensitive residential receptor is approximately 400 metres southwest of the premises. <p><i>Environmental Protection (Noise) Regulations 1997</i> apply.</p>
Dust	Acceptance, treatment, and storage of liquid waste vehicle movements	Air/windborne pathway causing impacts to health and amenity	<ul style="list-style-type: none"> No waste types proposed for receipt that are potential significant sources of dust.
Contaminated or potentially contaminated stormwater	Acceptance, treatment and storage of liquid waste	Direct discharge to land and surface waters causing contamination	<ul style="list-style-type: none"> Stormwater generated on the site is collected for storage and harvested for reuse onsite. Rainwater runoff is directed away from storage areas. The onsite stormwater system has been designed with the provision of an isolation valve at the connection point to the local authority stormwater drainage system. Then isolation valve will be automatically actuated by a fire signal from the Fire Indicator Panel Tank Farm and storage warehouse is bunded. Bulk and packaged waste hydrocarbon handling and storage within designated covered and bunded areas with concrete floors.

Emission	Sources	Potential pathways	Proposed controls
			<ul style="list-style-type: none"> • Bulk oil and water tanks in covered bunded tank farm within sump with sufficient capacity (>25% of largest tank volume). • Bulk oil fitted with level indicators and alarms (high and high-high). • Implementation of procedures for loading/unloading. • Vehicle refueling tanks and bowzers in bunded area with concrete floor. • Kerosene and diesel tanks self-bunded with level indicators and alarms. • Automatic and emergency shutoff valves at bulk liquid load/unload points. • Washdown bay connected to triple-chamber interceptor connected to wastewater storage tank. • All external areas are hardstand. • Spill kits located at strategic points on the premises. • Spill response procedures implemented through Environmental Management System
Wastewater	Treatment of liquid waste and sludge	Degradation of surface water and groundwater quality	<ul style="list-style-type: none"> • No treatment of waste will occur onsite. • Wastewater and waste oil will be stored within 7 storage tanks prior to removal for disposal offsite. • Tank farm is located within a concrete bunded compound with capacity to contain minimum 110% of the largest tank. • Bulk and packaged waste hydrocarbon handling and storage within designated. • Covered and bunded areas with concrete floors. • Fit for purpose wastewater pipes to be specialised dual layer poly pipes with flow flowmeter and pressure

Emission	Sources	Potential pathways	Proposed controls
			gauge.
Odours	Hydrocarbon Storage and spray booth	Air/windborne pathway	<ul style="list-style-type: none"> Spray booth will be constructed and installed in accordance with AS/NZS 4114.1:2020. Spray booth in enclosed Workshop. Maintained filtration system on spray booth exhaust. Waste oils and oily water are not treated on the premises either by heating or chemical treatment. Venting will be limited to storage tanks during loading and unloading of tanks. Covered Bunded Tank Farm. Covered, partially enclosed Bunded Warehouse. Use of closed hose couplings for tanker deliveries. Tanker vents connected to storage tank during loading to create a closed loop. No heating or chemical processing being undertaken onsite
Fire risk (smoke and gases)	Hydrocarbon operations	Air/windborne pathway causing impacts to health and amenity	<ul style="list-style-type: none"> Fire detection and fire-fighting equipment located throughout the premises, including sprinkler system in the Workshop. Fire detection system linked to emergency services. Implementation of Site Emergency Management Plan.

5.1.2 Receptors

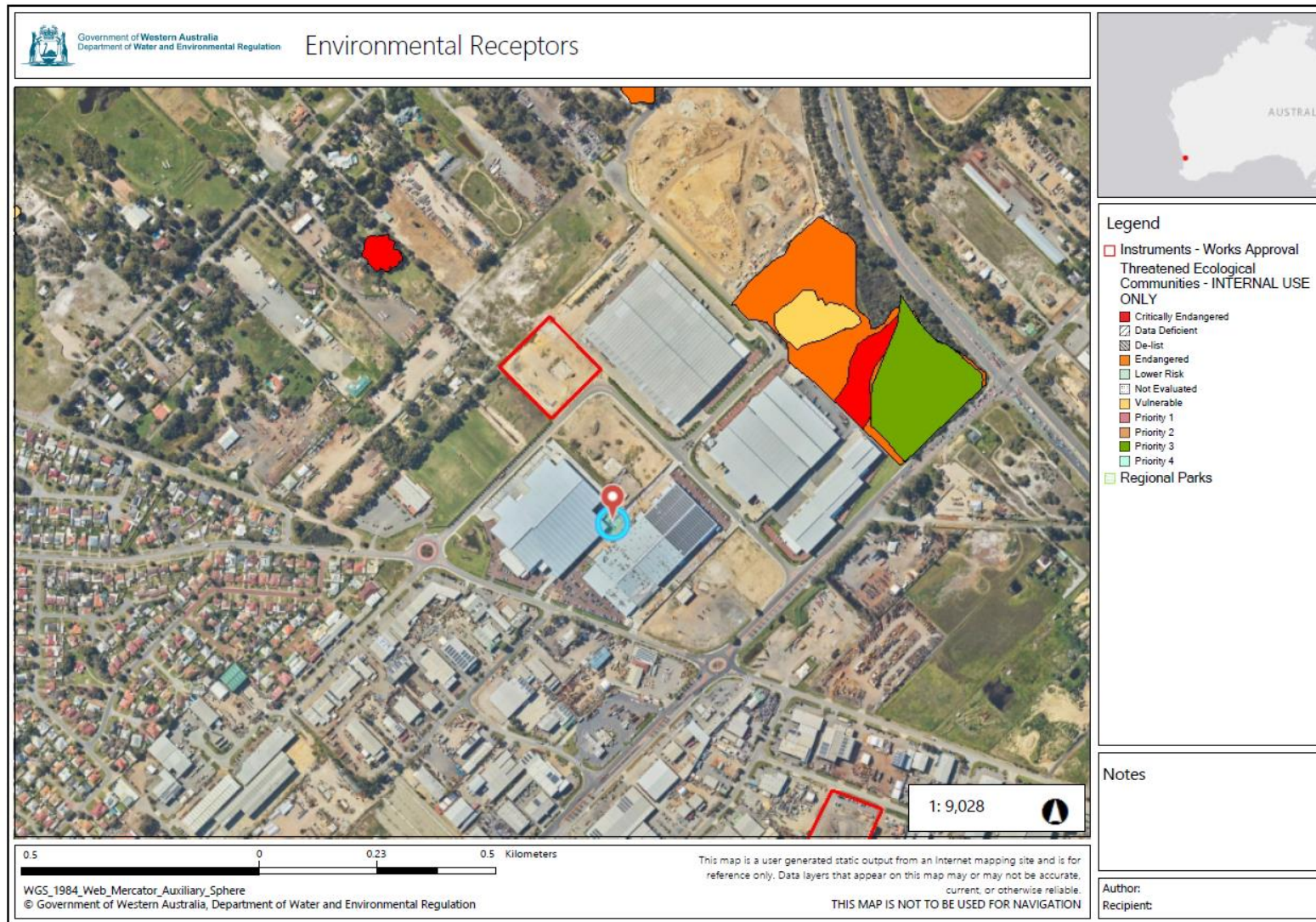
In accordance with the *Guideline: Risk Assessment* (DWER 2020), the Delegated Officer has excluded the applicant's employees, visitors, and contractors from its assessment. Protection of these parties often involves different exposure risks and prevention strategies and is provided for under other state legislation.

Table 2 and Figure 4 provide a summary of potential human and environmental receptors that may be impacted as a result of activities upon or emission and discharges from the prescribed premises (*Guideline: Environmental Siting* (DWER 2020)).

Table 2: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	Distance from prescribed activity
Residential premise	420m Southwest
Community Centre	225m West
Commercial businesses	100m to the east and southeast
Environmental receptors	Distance from prescribed activity
Wetlands	1.5km Northwest
Aquifer	~12m below ground level

Figure 4: Distance to sensitive receptors



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IR-T13 Decision report template (short) v3.0 (May 2021)

5.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for each identified emission source and takes into account potential source-pathway and receptor linkages as identified in Section 5.1. Where linkages are in-complete they have not been considered further in the risk assessment.

Where the applicant has proposed mitigation measures/controls (as detailed in Section 5.1), these have been considered when determining the final risk rating. Where the delegated officer considers the applicant's proposed controls to be critical to maintaining an acceptable level of risk, these will be incorporated into the works approval as regulatory controls.

Additional regulatory controls may be imposed where the applicant's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 3.

Works approval W6610/2021/1 that accompanies this decision report authorises construction only. The conditions in the issued works approval, as outlined in Table 3 have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

A licence is required to authorise emissions associated with the ongoing operation of the premises. A risk assessment for the operational phase has been included in this decision report, however licence conditions will not be finalised until the department assesses the licence application.

Table 3: Risk assessment of potential emissions and discharges from the premises during construction, commissioning and operation

Risk events					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of works approval	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
Construction								
Construction works (internal and external infrastructure)	Dust	Air / windborne pathway causing impacts to health and amenity	Residences 420m north and 800m south-east	Refer to Section 5.1	C = Minor L = Rare Low Risk	Y	Condition 1	The Delegated Officer considers that the provisions of section of the EP Act and EP Regulations is sufficient to regulate dust emissions from construction activities.
	Noise			Refer to Section 5.1	C = Moderate L = Unlikely Medium Risk	Y	Condition 1	The Delegated Officer considers that the provisions of <i>the Environmental Protection (Noise) Regulations 1997</i> are sufficient to regulate noise emissions from construction activities.
	Spills of hydrocarbons and other chemicals from vehicles and equipment	Direct discharge to land and surface waters causing contamination	Drainage reserve is located approximately 75 m to the south of the site boundary	Refer to Section 5.1	C = Moderate L = Rare Medium Risk	Y	Condition 1	Minor hydrocarbon and chemical spillages are adequately regulated by the <i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i> .
Commissioning and Operation (including time-limited operations)								
Liquid waste acceptance, and storage.	Odour	Air/windborne pathway causing impacts to health and amenity	Residences 750 m southeast Commercial/industrial receptors – adjacent to the west, within 100 m to the east, north and south	Refer to Section 5.1	C = Moderate L = Possible Medium Risk	Y	Conditions 1, 2 and 3 <u>Condition 11</u>	The Delegated Officer considers the applicant's controls to be sufficient to mitigate the potential for odour emissions generated by waste storage activities.
	Noise	Air / windborne pathway causing impacts to health	Residences 420m north and 800m	Refer to Section 5.1	C = Moderate	Y	Conditions 1, 2 and 3	The Delegated Officer considers that noise are adequately regulated under

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Risk events					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of works approval	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
		and amenity	south-east		L = Unlikely Medium Risk			the provisions the <i>Environmental Protection (Noise) Regulations 1998</i> .
	Contaminated or potentially contaminated stormwater	Degradation of surface water and groundwater quality	Drainage reserve is located approximately 75 m to the south of the site boundary Groundwater (27 mbgl)	Refer to Section 5.1	C = Moderate L = Unlikely Medium Risk	Y	Conditions 1, 2, 3 and 6 <u>Conditions 8, 9, 10, 12 and 13</u>	<p>The Delegated Officer considers the applicant's controls to be sufficient to mitigate the potential for hazardous spills generated by waste storage activities.</p> <p>Conditions 2 and 3 require the submission of an Environmental Compliance Report to verify the works have been constructed in accordance with the relevant requirements.</p> <p>All associated pipe work and storage tanks will hydrostatically tested and certified on completion.</p> <p>To mitigate the discharge of spills through the stormwater drain network, the instrument will restrict the location of stormwater drains to outside areas that are not designated as waste storage areas.</p>
Washwater resulting from a fire event	Contaminated Fire water	Degradation of surface water and groundwater quality	Wetland approximately 1.5lm north east of the site boundary Groundwater 12 m mbgl)	Refer to Section 5.1	C = Major L = Unlikely Medium Risk	Y	Conditions 1, 2 and 3 <u>Condition 6</u>	<p>The Delegated Officer has included a requirement to install automatic shut-off valves within the stormwater network to ensure fire contaminated wastewater is contained in the event of a fire.</p> <p>The requirements within the instrument which mitigate the risk of fire, as identified above, subsequently reduce the potential for firewater</p>

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Risk events					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of works approval	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
								<p>generation and discharge.</p> <p>Conditions 2 and 3 require the submission of an Environmental Compliance Report to verify the works have been constructed in accordance with the relevant requirements.</p>

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the *Guideline: Risk Assessments* (DWER 2020).

Note 2: Proposed applicant controls are depicted by standard text. **Bold and underline text** depicts additional regulatory controls imposed by department.

6. Consultation

Table 4 provides a summary of the consultation undertaken by the department.

Table 4: Consultation

Consultation method	Comments received	Department response
Application advertised on the department's website on 19 November 2022	None received	N/A
Local Government Authority advised of proposal on 24/11/21	<p>The City of Gosnells replied on 23/12/2021. The City is assessing a development application in relation to the proposal which is scheduled to be presented to Council for determination at its ordinary Council Meeting of 21 December 2021. The recommendation for the application is that it be approved subject to conditions and advice.</p> <p>Received confirmation 10/1/2022 that the development application (DA21/0046) for the site had been approved by council subject to the conditions.</p>	The Delegated Officer has considered the recommendations provided by City of Gosnells in the Development Application to ensure consistency with Departments works approval conditions
Applicant was provided with draft documents on 22/2/2022	Refer to Appendix 1	Refer to Appendix 1

7. Conclusion

Based on the assessment in this decision report, the delegated officer has determined that a works approval will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

References

1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
2. DWER 2019, *Guideline: Decision Making*, Perth, Western Australia.
3. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
4. DWER 2019, *Guideline: Industry Regulation Guide to Licensing*, Perth, Western Australia.
5. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.

Appendix 1: Summary of applicant's comments on risk assessment and draft conditions

Condition	Summary of applicant's comment	Department's response
Condition 1 – Table 1	<p>The first bullet point of the design and construction/installation requirements specifies that the concrete hardstand and bunding must be sealed with a chemical and oil resistant coating. The final design of the facility does not include a coating (epoxy or other) for the concrete hardstand areas. The proposed concrete grade (compressive strength) and hard trowelled finish will provide an impervious barrier to the floor. Cleanaway requests that the design and construction/installation requirements be amended to:</p> <ul style="list-style-type: none"> • <i>All waste acceptance, storage to be concrete bunded.</i> 	<p>Bunding and containment is integral to prevent unauthorised discharges from occurring. Installation of the hard stand and bunded area is to ensure that the area is able to contain potential spillages.</p> <p>The Delegated Officer agrees in part and has amended the condition to concrete hardstand and bunds to be impervious for those areas where storage and handling of waste will occur.</p>
	<p>The second bullet point of the design and construction/installation requirements specifies that the hardstand must meet a permeability of not less than 1×10^{-9} m/s. It is not practical to demonstrate that the concrete floor meets a permeability of less than 1×10^{-9} m/s without obtaining a sample of the concrete for analysis in an external laboratory, with implications on the integrity of the floor and also on time and cost. The floor will be inspected by a suitably qualified civil or structural engineer to confirm that the integrity of the base is intact. As all waste acceptance, storage and treatment areas will be on a concrete floor, there is no specific requirement for these areas to have a hardstand. Cleanaway requests that this bullet point is deleted.</p>	<p>Bunding and containment is integral to prevent unauthorised discharges from occurring. Installation of the hard stand and bunded area is to ensure that the area is able contain potential spillages.</p> <p>The Delegated Officer agrees in part and has amended the condition to concrete hardstand and bunds to be impervious for those areas where storage and handling of waste will occur.</p>

Condition	Summary of applicant's comment	Department's response
Condition 1 – Table 1 – Bunded Warehouse	As per Item 1 above, the final design of the tank farm bunds does not include a coating (epoxy or other) for the concrete, joints, cuts or incisions. The proposed concrete grade (compressive strength) and hard trowelled finish will provide an impervious barrier to the floor. Cleanaway requests that bullet points three and four of the design and construction/installation requirements be deleted.	<p>Bunding and containment is integral to prevent unauthorised discharges from occurring. Installation of the hard stand and bunded area is to ensure that the area is able contain potential spillages.</p> <p>The Delegated Officer agrees in part and has amended the condition to concrete hardstand and bunds to be impervious for those areas where storage and handling of waste will occur.</p>
Condition 1 – Table 1 – Bunded Warehouse	<p>The sixth bullet point of the design and construction/installation requirements specifies that the below-ground pipework system from the warehouse to the bunded tank farm must be fitted with a flow meter and pressure gauge or other leak detection system. The final design of the pipework does not include a flow meter or pressure gauge. Instead, the buried pipework primary containment will have secondary containment, the integrity of which can be tested and confirmed as required using a physical pressure test. Flow switches will be installed to automatically turn off the pump in the event that no flow is detected. The specification of the piping also exceeds the maximum pump discharge pressure rating. Cleanaway requests that design and construction/installation requirements be amended to:</p> <ul style="list-style-type: none"> • <i>Below ground wastewater pipework system from warehouse to bunded tank bunded farm to be fitted with secondary containment and flow switches with automatic pump shut-of</i> 	The Delegated Officer agrees and has updated the condition.

Condition	Summary of applicant's comment	Department's response
Condition 1 – Table 1 – Bunded Warehouse – Diesel Tank (74kl)	The capacity of the diesel tank has been reduced to 30 kL to mitigate potential issues with the diesel fuel sweating during refilling. Cleanaway requests that the infrastructure description is updated to reflect the smaller tank.	Delegated Officer agrees and has amended the condition.
Condition 1 – Table 1 – Bunded Warehouse – Diesel Tank (74kl)	The second bullet point of the design and construction/installation requirements requires the bowser to be located on a concrete apron that drains to the tank farm bunded area. The final tank design has the bowser installed inside the diesel tank cowling (but still on a concrete apron). Cleanaway requests that the design and construction/installation requirements be amended to: • <i>Tank and including bowser in tank cowling to be located on a concrete apron which drains to tank farm bunded area.</i>	Delegated Officer agrees and has amended the condition.
Condition 1, Table 1, Row 6 - Kerosene Tank (30 kL)	As per Item 6 above, the final tank design has the bowser installed inside the diesel tank cowling (but still on a concrete apron). Therefore, Cleanaway requests that the second bullet point of the design and construction/installation requirements be amended to: • <i>Tank and including bowser in tank cowling to be located on a concrete apron which drains to tank farm bunded area.</i>	Delegated Officer agrees and has amended the condition.
Condition 1, Table 1, Row 7 - Fire Protection System	The first bullet point of the design and construction/installation requirements specifies that the workshop must include a sprinkler system (as per application). However, the sprinkler system has been removed from the final design of the facility. A fire detection system will be installed along with additional portable fire-fighting equipment located adjacent to the paint spray booth. Due to the nature of the building construction materials, the height and type of materials stored in racking in the warehouse, and the nature of the work that will be carried	Delegated Officer agrees and has amended the condition.

Condition	Summary of applicant's comment	Department's response
	<p>out in the warehouse, the installation of a sprinkler system is not required under the National Construction Code or the Australian Standard for the storage and handling of flammable and combustible liquids (AS 1940-2004).</p> <p>Therefore, Cleanaway requests that the design and construction/installation requirements be amended to:</p> <ul style="list-style-type: none"> • <i>Fire detection and fire-fighting equipment to be installed throughout the premises, including a sprinkler system in the workshop.</i> 	
Condition 6, Table 3, Row 2 - Bunded Warehouse	Cleanaway requests that the first and second bullet points of the operational requirements be amended to be consistent with the changes proposed in Items 1 and 2 above.	Delegated Officer agrees and has amended the condition.
Condition 6, Table 3, Row 3 - Bunded Tank Farm	Cleanaway requests that the third and fourth bullet points of the operational requirements be amended to be consistent with the changes proposed in Item 3 above.	Delegated Officer agrees and has amended the condition.
Condition 6, Table 3, Row 3 - Bunded Tank Farm	Cleanaway requests that the sixth bullet point of the operational requirements be amended to be consistent with the changes proposed in Item 4 above.	Delegated Officer agrees and has amended the condition.
Condition 6, Table 3, Row 5 - Diesel Tank (74 kL)	Cleanaway requests that the site infrastructure and equipment description and second bullet point of the operational requirements be amended to be consistent with the changes proposed in Items 5 and 6 above.	Delegated Officer agrees and has amended the condition.
Condition 6, Table 3, Row 6 - Kerosene Tank (30 kL)	Cleanaway requests that the second bullet point of the operational requirements be amended to be consistent with the changes proposed in Item 7 above.	Delegated Officer agrees and has amended the condition.

Condition	Summary of applicant's comment	Department's response
Condition 6, Table 3, Row 7 - Fire Protection System	Cleanaway requests that the first bullet point of the operational requirements be amended to be consistent with the changes proposed in Item 8 above.	Delegated Officer agrees and has amended the condition.
Condition 7, Table 4 Waste types	The types of waste permitted to be accepted onto the premises as provided in the application was incomplete and did not include all waste types that will be accepted at the premises as registered under the Controlled Waste Tracking system. Cleanaway requests that the waste types are updated as per Table 2 below. This list of wastes is consistent with those accepted at the existing Ewing St facilities.	<p>The application and assessment was based on J100, J120, J130, J160 and J170 waste which is primarily a mixture of waste oils.</p> <p>Delegated Officer agrees in part as the waste stream is of similar risk. Works Approval has been amended to include J180 - Oil Sludge and M103 – vehicle coolant.</p> <p>The additional control waste categories waste being sort is outside the scope of the original application and has not been assessed in relation to the risk of storage, handling and volumes of those waste streams listed.</p> <p>The applicant will need to submit a separate amendment to the works approval application for remainder of the categories detailing the volumes and these waste stream will be stored and handled once received.</p> <p>Delegated Officer does not support the change for this current application.</p>
Condition 11, Table 5 Waste types	As per item 15 above, Cleanaway requests that the waste types in the waste processing table be amended to be consistent with those is Table 3 below. Changes are also requested to the process requirements, which excludes	The applicant will need to submit a separate amendment to the works approval application for remainder of the categories detailing the volumes and these waste stream will be stored and handled once received.

Condition	Summary of applicant's comment	Department's response
	wastes from being stored in the Workshop and Bunded Warehouse.	
Condition 14, Table 6 Units	Cleanaway requests that waste accepted onto the premises is recorded in litres (not m ³) and tonnes to be consistent with controlled waste tracking documentation requirements.	Table 6 has been updated
Condition 15, Table 7 Units	Cleanaway requests that waste removed from the premises is recorded in litres (not m ³) and tonnes to be consistent with controlled waste tracking documentation requirements	Table 7 has been updated
Schedule 1: Maps Figure 3: Proposed tank farm	An updated version of the figure is provided in Attachment B. The same figure can be used to update Figure 3 of the decision report.	Figure 3 has been updated

Appendix 2: Application validation summary

SECTION 1: APPLICATION SUMMARY					
Application type					
Works approval	<input checked="" type="checkbox"/>				
Licence	<input type="checkbox"/>	Relevant works approval number:		None	<input type="checkbox"/>
		Has the works approval been complied with?			Yes <input type="checkbox"/> No <input type="checkbox"/>
		Has time limited operations under the works approval demonstrated acceptable operations?			Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
		Environmental Compliance Report / Critical Containment Infrastructure Report submitted?			Yes <input type="checkbox"/> No <input type="checkbox"/>
		Date Report received:			
Renewal	<input type="checkbox"/>	Current licence number:			
Amendment to works approval	<input type="checkbox"/>	Current works approval number:			
Amendment to licence	<input type="checkbox"/>	Current licence number:			
		Relevant works approval number:		N/A	<input type="checkbox"/>
Registration	<input type="checkbox"/>	Current works approval number:		None	<input type="checkbox"/>
Date application received		26 August 2021			
Applicant and Premises details					
Applicant name/s (full legal name/s)		Nationwide Oil Pty Ltd			
Premises name		Nationwide Oil Pty Ltd			
Premises location		Part Lot 801 on Deposited Plan 413051			
Local Government Authority		City of Gosnells			
Application documents					
HPCM file reference number:		DER2018/001042-6~13			
Key application documents (additional to application form):		<ul style="list-style-type: none"> • Cleanaway Pty Ltd Works Approval Application – New Hydrocarbons Facility: • Proof of Occupier Status – Certificate of Title • Proof of Occupier Status – Lease • ASIC Company Extract • Premises Map • Development Approval (Warehouse 5) • Siting and Location • Site Layout Plans • Tank Farm Plans • Stormwater System Plans 			

	<ul style="list-style-type: none"> • Site Emergency Management Plan
Scope of application/assessment	
Summary of proposed activities or changes to existing operations.	<p><i>8. Works approval</i></p> <p>The application is for the proposed construction of a new waste hydrocarbon storage facility. The applicant proposes to accept bulk and packaged hydrocarbon (oily waste) liquid waste at the facility. No process waste is proposed to be discharged into the environment.</p> <p>The facility, when completed, will be similar to the operations at the Nationwide Oil premises at 32 and 113 Ewing Street Welshpool. Currently only the facility at 32 Ewing Street (L8740/2013/2) is regulated as a prescribed premises. Licence L8272/2008/2 for the 113 Ewing Street facility was recently surrendered by Nationwide Oil (licence revoked on 15 October 2021).</p> <p>The Maddington facility will receive the respective waste streams and assess and determine appropriate treatment before offsite recovery or disposal.</p> <p>The site does not have a sewer connection and therefore will not have a Trade Waste permit.</p> <p>Waste will be unloaded and stored in the Bunded Tank Farm or Bunded Warehouse. Waste liquid hydrocarbons will be transferred into bulk storage tanks at the Bunded Tank Farm.</p> <p>Wastewater that separates in the oil storage tanks will be pumped to water storage tanks in the Bunded Tank Farm or the Bunded Warehouse.</p> <p>Sludge that accumulates in the water and oil storage tanks will be transferred offsite or to the fixation pit for mixing with other wastes into a suitable composition for disposal offsite at a suitably authorised landfill.</p> <p>Oil filters will be crushed with oil transferred to a sealed container and the crushed filters aggregated and stored in the Bunded Warehouse for transfer offsite for recovery. Other oil-contaminated solid wastes will be stored in bins in the Bunded Warehouse.</p>

Category number/s (activities that cause the premises to become prescribed premises)

Table 1: Prescribed premises categories

Prescribed premises category and description	production or design capacity	Proposed changes to the production or design capacity (amendments only)
Category 61	25,000 tonnes per year	N/A
Category 62	10,000 tonnes per year	N/A

Legislative context and other approvals

Has the applicant referred, or do they intend to refer, their proposal to the EPA under Part IV of the EP Act as a significant proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Referral decision No: Managed under Part V <input type="checkbox"/> Assessed under Part IV <input type="checkbox"/>
Does the applicant hold any existing Part IV Ministerial Statements relevant to the application?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Ministerial statement No: EPA Report No:
Has the proposal been referred and/or assessed under the EPBC Act?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Reference No:
Has the applicant demonstrated occupancy (proof of occupier status)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Certificate of title <input checked="" type="checkbox"/> General lease <input checked="" type="checkbox"/> Expiry: 10 years on commencement. Mining lease / tenement <input type="checkbox"/> Expiry: Other evidence <input type="checkbox"/> Expiry:
Has the applicant obtained all relevant planning approvals?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Approval: DA21/00028 (City of Gosnells) Expiry date: 10 years on completion of works. If N/A explain why?
Has the applicant applied for, or have an existing EP Act clearing permit in relation to this proposal?	Yes <input type="checkbox"/> No <input type="checkbox"/>	CPS No: N/A No clearing is proposed.
Has the applicant applied for, or have an existing CAWS Act clearing licence in relation to this proposal?	Yes <input type="checkbox"/> No <input type="checkbox"/>	Application reference No: N/A Licence/permit No: N/A No clearing is proposed.
Has the applicant applied for, or have an existing RIWI Act licence or permit in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Application reference No: Licence/permit No: Licence / permit not required.

Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the EP Act)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Name: N/A Type: N/A Has Regulatory Services (Water) been consulted? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Name: N/A Priority: N/A Are the proposed activities/landuse compatible with the PDWSA (refer to WQPN 25)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
Is the Premises subject to any other Acts or subsidiary regulations (e.g. <i>Dangerous Goods Safety Act 2004</i> , <i>Environmental Protection (Controlled Waste) Regulations 2004</i> , <i>State Agreement Act xxxx</i>)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<i>Dangerous Goods Safety Act 2004</i> The site will have small volumes (2000 litres) of paints, thinners and solvents that are stored onsite for the parts washer business. Operations at the premises will therefore be subject to a Dangerous Goods (DG) licence.
Is the Premises within an Environmental Protection Policy (EPP) Area?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	N/A
Is the Premises subject to any EPP requirements?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	N/A
Is the Premises a known or suspected contaminated site under the <i>Contaminated Sites Act 2003</i> ?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	N/A